

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of
Administration of the North
American Numbering Plan
Carrier Identification Codes

CC Docket No. 92-237

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FURTHER COMMENTS

MCI Telecommunications Corporation (MCI) respectfully submits these further comments, pursuant to the Federal Communications Commission's (Commission's or FCC's) public notice asking for further comments on the subject of Carrier Identification Codes (CICs), Public Notice, DA 96-678, released Apr. 30, 1996.

The Commission notes that significant changes have occurred since the record was closed in this docket in 1994. Specifically: (1) assignment of four-digit CICs has begun and the transition period has begun; (2) there has been an unexpected increase in the demand for CICs, due to new uses for the codes "recently discovered by the industry;" (3) FCC now expects an even greater demand for CICs with the increase in carriers entering the market as a result of the 1996 Telecom law; and (4) LECs are now obligated to provide dialing parity under Section 251 of the law.

With respect to demand, MCI believes that CICs are now being sought by service providers for purposes other than those intended in the industry's guidelines. These numeric codes are intended to identify customers who purchase Feature

J. P. [unclear]
[unclear]

Group B (FGB) and/or Feature Group D (FGD) access services from local exchange carriers.¹ They are primarily used for routing from the local exchange network to the access purchaser and may be used for billing between the LEC and the access purchaser.

The supply of CICs is limited. The expansion of the CIC resource to four digits provided a pool of approximately 9,000 codes for FGB access and 10,000 codes for FGD access.² However, during the transition from three to four digits, only the 5XXX and 6XXX blocks of CICs are being assigned for FGB access (for example: 950-5022). Permissive dialing can only be supported while these blocks are available for assignment, although additional blocks will be opened when they exhaust. When the need arises to assign numbers beyond these blocks, switches will be unable to differentiate between a 3-digit and a 4-digit code and permissive dialing will no longer work.

There is a risk that 5XXX and 6XXX CICs will exhaust prematurely if the industry treats CICs as a miscellaneous numbering resource, available for any purpose. The industry can and should develop alternative means to accommodate these other purposes. Premature exhaust will cause a shortening of

¹ Industry Carriers Compatibility Forum, Carrier Identification Code Assignment Guidelines, Sec. 1.2.

² There are technical limitations which prevent the use of both the 0XXX and 1XXX ranges in the FGB resource (for example, if the CIC 1022 is in use by one carrier, no other carrier can be assigned the CIC 0022). This constraint results in availability of only 9,000 4-digit CICs in the FGB resource.

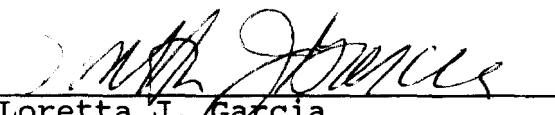
the permissive dialing period, and might result in an inability of access suppliers to provide access services to new entrants.

Therefore, MCI urges the Commission to avert the need to truncate the permissive dialing period by discouraging the use of CICs for purposes other than those intended in the industry guidelines.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

By:

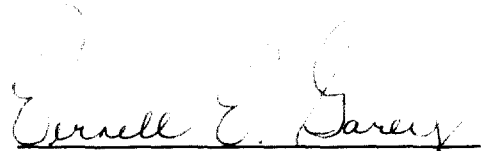

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Dated: May 21, 1996

CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that copies of the foregoing "Further Comments of MCI Telecommunications Corporation", in CC Docket No. 92-237 were served by first class mail, postage paid (unless otherwise indicated) on the following parties this 21st day of May 1996.

A handwritten signature in cursive script, reading "Vernell V. Garey", is written over a horizontal line.

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